

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HERMÈS INTERNATIONAL and
HERMÈS OF PARIS, INC.,

Plaintiffs,

-against-

MASON ROTHSCHILD,

Defendant.

CIVIL ACTION NO.

22-CV-00384 (JSR)

SUPPLEMENTAL DECLARATION OF MEGAN A. CORRIGAN

I, Megan A. Corrigan, declare as follows:

I am an attorney associated with the firm of Baker & Hostetler LLP, attorneys for Plaintiffs Hermès International and Hermès of Paris, Inc. (“Hermès”) in the above-captioned case. I submit this declaration in support of Hermès’s Opposition to Defendant’s Motion for Summary Judgment. I have firsthand knowledge of the matters stated herein. This declaration is supplemental to, and the exhibits hereto follow those filed in, the October 7, 2022 Declaration of Megan A. Corrigan, and exhibits filed thereto (ECF No. 72).

1. Attached hereto as **Exhibit 130** is a true and correct copy of a text message exchange between Mason Rothschild, Moshe Sacks, and Alex Sacks, bearing bates number SACKS_000304.

2. Attached hereto as **Exhibit 131** is a true and correct copy of a text message exchange between Mason Rothschild and Mark Design, dated March 18, 2021, bearing bates numbers Rothschild011242 – Rothschild011278.

3. Attached hereto as **Exhibit 132** is a true and correct copy of excerpts from the

September 20, 2022 deposition of Dr. Bruce Isaacson.

4. Attached hereto as **Exhibit 133** is a true and correct copy of a screenshot of a text message exchange between Mason Rothschild and Jesse Lee, bearing bates number Rothschild008969.

5. Attached hereto as **Exhibit 134** is a true and correct copy of excerpts from the August 4, 2022 deposition of Mr. Mason Rothschild.

6. Attached hereto as **Exhibit 135** is a true and correct copy of excerpts from the September 23, 2022 deposition of Dr. Blake Gopnick.

7. Attached hereto as **Exhibit 136** is a true and correct copy of Exhibit 189 from the September 23, 2022 deposition of Dr. Blake Gopnick, a screenshot of a transcript of an interview with Dr. Blake Gopnick, titled, “What does Warhol ‘fair use’ ruling mean for artists and copyrights?” dated April 9, 2021.

8. Attached hereto as **Exhibit 137** is a true and correct copy of a screenshot of a tweet from @MasonRothschild, dated October 11, 2022, from <https://twitter.com/MasonRothschild/status/1579869073101373441>, and captured on October 13, 2022, using PageVault¹.

9. Attached hereto as **Exhibit 138** is a true and correct copy of a screenshot of the MetaBirkin Instagram page, www.instagram.com/metabirkins, accessed on January 10, 2022, bearing bates numbers HERMES_0037428 – HERMES_0037430.

10. Attached hereto as **Exhibit 139** is a true and correct copy of Exhibit 25 from the August 4, 2022 deposition of Mason Rothschild, a text message exchange between Mason

¹ PageVault is a service that helps legal professionals capture Web Based Content in a manner that preserves and accurately portrays the Web Based Content as of the date of the capture.

Rothschild and Mark Design, dated November 4, 2021, bearing bates numbers Rothschild008409 – Rothschild008458.

11. Attached hereto as **Exhibit 140** is a true and correct copy of a text message exchange between Mason Rothschild and Micah Spear, dated December 21, 2021, bearing bates numbers Rothschild016430 – Rothschild16457.

12. Attached hereto as **Exhibit 141** is a true and correct copy of excerpts from the September 21, 2022 deposition of Dr. David Neal.

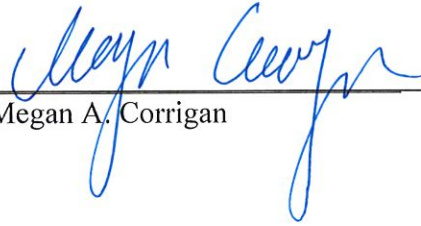
13. Attached hereto as **Exhibit 142** is a true and correct copy of the U.S. Trademark and Patent Office's Trademark Status & Document Retrieval record for Application No. 97112038, generated on October 18, 2022.

14. Attached hereto as **Exhibit 143** is a true and correct copy of the U.S. Trademark and Patent Office's Trademark Status & Document Retrieval record for Application No. 917112054, generated on October 18, 2022.

15. Attached hereto as **Exhibit 144** is a true and correct copy of excerpts from the August 30, 2022 deposition of Hermès's 30(b)(6) witness, Nicolas Martin.

16. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: October 21, 2022
New York, New York

By: 
Megan A. Corrigan